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**From:** Caplan, Robert W. [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D02D2CB3F9284E84B1F4618E7E5C869E-CAPLAN, ROBERT]  
**Sent:** 11/27/2018 12:04:21 AM  
**To:** Ingersoll, Andrew (ENRD) [Andrew.Ingersoll@usdoj.gov]  
**Subject:** RE: Drummond; ABC Coke; EPA; JCDH; privileged and confidential

Step by step, inch by inch. . . Thanks for letting me know!

bc

Robert Caplan  
Senior Attorney  
U.S. EPA, Region 4  
61 Forsyth Street  
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**From:** Ingersoll, Andrew (ENRD) <Andrew.Ingersoll@usdoj.gov>  
**Sent:** Monday, November 26, 2018 4:38 PM  
**To:** Caplan, Robert W. <Caplan.Robert@epa.gov>  
**Subject:** FW: Drummond; ABC Coke; EPA; JCDH; privileged and confidential

Good news.

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**From:** Wade Merritt <[wmerritt@spain-gillon.com](mailto:wmerritt@spain-gillon.com)>  
**Sent:** Monday, November 26, 2018 3:51 PM  
**To:** Ingersoll, Andrew (ENRD) <[AIngersoll@ENRD.USDOJ.GOV](mailto:AIngersoll@ENRD.USDOJ.GOV)>  
**Cc:** David Maxey <[dmaxey@spain-gillon.com](mailto:dmaxey@spain-gillon.com)>; Dana M. Lavallet <[dlavallet@spain-gillon.com](mailto:dlavallet@spain-gillon.com)>; Connie Hughes <[chughes@spain-gillon.com](mailto:chughes@spain-gillon.com)>  
**Subject:** Drummond; ABC Coke; EPA; JCDH; privileged and confidential

Good afternoon, Andrew. Your updated complaint looks fine to me. The only change I made is to update our firm's address. On a related note, I forgot to change our address on the most recent draft of the consent decree. Can you update that for me?

Thanks,  
Wade

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Wade C. Merritt  
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